

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

FILED 12 FEB '14 09:55AM CDT

UNITED STATES OF AMERICA

Case No. 3:14-cr-00073-SI

v.

INDICTMENT

MICHAEL JOSEPH KELLY, and
MARCUS WRIGHT KELLY

21 U.S.C. §§ 841(a)(1); (b)(1)(B)(i); 846;
and 853

Defendants.

THE GRAND JURY CHARGES:

**COUNT 1
(Drug Conspiracy)**

Beginning about July 2013, and continuing to on or about November 21, 2013, in the District of Oregon, and elsewhere, **MICHAEL JOSEPH KELLY and MARCUS WRIGHT KELLY**, defendants herein, did knowingly and willfully combine, conspire, confederate and agree with others both known and unknown to the Grand Jury, to knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in a quantity of one hundred grams or more, all in violation of Title 21, United States Code, Sections 846, 841(a)(1) and (b)(1)(B)(i).

**COUNT 2
(Possession with Intent to Distribute Heroin)**

Beginning about July 2013, and continuing to on or about November 21, 2013, in the District of Oregon, and elsewhere, **MICHAEL JOSEPH KELLY and MARCUS WRIGHT KELLY**, defendants herein, did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance,

in a quantity of one hundred grams or more, all in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(i).

CRIMINAL FORFEITURE ALLEGATION

Upon conviction of one or more of the controlled substance offenses alleged herein **MICHAEL JOSEPH KELLY** and **MARCUS WRIGHT KELLY**, defendants herein, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violation.

Dated this 11 day of February 2014.

A TRUE BILL.

OFFICIATING FOREPERSON /

Presented by:

S. AMANDA MARSHALL
United States Attorney
District of Oregon



KEMP L. STRICKLAND
Assistant United States Attorney